

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

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**VIKRAM P. GROVER d/b/a
“IX ADVISORS” a/k/a “IXA,”**

Plaintiff,

v.

**NET SAVINGS LINK, INC., a
Colorado corporation and formerly
organized as a Nevada corporation,
WILTON GROUP, LIMITED, as
registered in the Isle of Man, U.K.,
WILTON UK (GROUP), LIMITED, as
registered in England and Wales, U.K.,
CHINA FOOD AND BEVERAGE CO.,
a Colorado corporation, and
JAMES A. TILTON,**

Defendants.

v.

**PACIFIC STOCK TRANSFER,
NSAVX, INC., a Wyoming corporation,
and JOHN DOE CORP., a/k/a
NSAVX.COM, a Puerto Rican
corporation,**

Trustee-Defendants.

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Civil Action No. 1:21-CV-05054

**REQUEST FOR ORAL ARGUMENT
ON AN EMERGENCY BASIS
ON JULY 10, 2024**

**PLAINTIFF VIKRAM P. GROVER’S
EMERGENCY MOTION FOR A SHORT ORDER OF NOTICE**

The Plaintiff, Vikram P. Grover (hereinafter “Mr. Grover”), pursuant to Federal Rules of Civil Procedure and the Local Rules of the U.S. District Court for the Northern District of Illinois, respectfully moves this Honorable Court, on an emergency basis, for a Short Order of Notice as to

a certain Motion which the Plaintiff is filing on a contemporaneous basis herewith, as follows: a) Plaintiff's Emergency Motion for Entry of Final Judgment Against the Corporate Defendants, with **Exhibit A** attached thereto.

In support hereof, on June 26, 2024, this Court entered Orders, *inter alia*, for attachment by trustee process of the Corporate Defendants' assets (hereinafter the "Attachment Order") and for equitable and injunctive relief (hereinafter the "Injunction Order," and collectively, with the Attachment Order, the "June 26th Orders" or the "Orders") as to the assets and shares of, *inter alia*, Net Savings Link, Inc. (hereinafter "NSAV"). Dkt. Nos. 167 & 168. Since that time, counsel for the Plaintiff has communicated with and delivered and/or served copies of the Orders upon certain third-parties, purportedly with possession custody, and/or control over the shares and/or assets of NSAV, and who have rejected compliance with such Orders. While the Plaintiff is anticipating the filing of additional Motions for contempt or other possible relief, Mr. Grover contends that it is appropriate to enter Final Judgment as to the Corporate Defendants.

For example, on or about June 27, 2024, counsel for the Plaintiff's communicated with the attorney for the NSAV transfer agent, Trustee-Defendant Pacific Stock Transfer, Inc. (hereinafter "PTSC"), Mark A. Harmon, Esq. of the law firm Chiesa, Shahinian & Giantomasi P.C., in New York City. *See* Email Exchange between Philip M. Giordano, Esq. and Mark A. Harmon, Esq., dated June 27, 2024, as attached, restated and incorporated by reference herein as **Exhibit A**. While Trustee-Defendant PSTC has indicated that "it will not process any requests by NSAV or any of the other named defendants, to issue additional shares or transfer shares currently registered in their names," it asserts that "requests to transfer from other registered shareholders and those requests will be honored as PSTC." *Id.*

As established in the Plaintiff's June 21st Motions and the related Affidavit and Memoranda filed therewith, Mr. Grover has reason to believe that Corporate Defendants are attempting to fraudulently avoid satisfying the Default Judgment rendered against them on December 5, 2023. Mr. Grover has reason to believe that the Defendants and/or third-parties are currently in the process of creating third-party entities and transferring and conveying assets and crypto-currency to other jurisdictions. Since the Corporate Defendants remain unrepresented, and because this Court has entered the Attachment Order and the Injunction Order (collectively, the "Orders") with respect to the Corporate Defendants assets, the time is appropriate and necessary for this Court to order an entry of Final Judgment upon the Corporate Defendants. Given these facts, the Plaintiff respectfully submits that there is no just reason for delaying the entry of a final judgment against the Corporate Defendants in the instant action, and doing so will not impact the outstanding Motion for Summary Judgment by the Plaintiff against the Defendant, James Tilton.

As detailed in the various papers filed herewith and on June 21, 2024, the Defendants are clearly seeking to fraudulently convey assets and transfer or assign the same beyond the judicial reach of this Honorable Court. As a result, an emergency situation exists and the Plaintiff will suffer irreparable harm in the absence of a Short Order of Notice. Mr. Grover further states that the facts set forth in the various Motions are largely and substantially undisputed and are based upon the Default Judgment entered against the Corporate Defendants months ago. Finally, in January 2024, the Plaintiff filed his Motion for Summary Judgment against Defendant Tilton, which remains pending but to which there are no material facts in dispute.

The Plaintiff respectfully requests that the instant Motion be granted on the papers at this Court's earliest convenience, or, in the alternative and in the discretion of this Honorable Court,

requests an emergency hearing, on a Short Order of Notice, on Wednesday, July 10th, or at such opportunity as may be reasonably convenient for the Court.

WHEREFORE, the Plaintiff, Vikram P. Grover, respectfully moves this Honorable Court on an emergency basis, for a Short Order of Notice as to certain Motions which the Plaintiff is filing on a contemporaneous basis herewith, as follows: a) Plaintiff's Emergency Motion for Entry of Final Judgment, and requests that his Motion be granted on the papers at this Court's earliest convenience, or, in the alternative and in the discretion of this Honorable Court, requests an emergency hearing, on a Short Order of Notice, on Wednesday, July 10th, or at such opportunity as may be reasonably convenient for the Court.

Respectfully submitted,
PLAINTIFF, Vikram Grover,

By his Attorney,

/s/ Philip M. Giordano
Philip M. Giordano, Esq.
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Dated: July 3, 2024

CERTIFICATE OF SERVICE

I, Philip M. Giordano, do hereby certify that on the 3rd day of July, 2024, I caused to be served a true and correct copy of Plaintiff Vikram Grover's Emergency Motion for a Short Order of Notice as filed by and through the District Court's electronic filing/ECF system and that such true copy is available for downloading and viewing by all counsel and parties of record.

Dated: July 3, 2024

/s/ Philip M. Giordano
Philip M. Giordano